

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

In re:

Sepopo S. Senouwoe

**Case No. 24-50148-RBC
Chapter 13**

Debtor(s)

**MOTION TO EXTEND TIME
TO FILE REMAINING SCHEDULES, STATEMENTS, LISTS & CHAPTER 13 PLAN**

Debtor, Sepopo S Senouwoe, by counsel, moves this Honorable Court for an extension of time within which to file his outstanding schedules, statements, lists, and Chapter 13 plan. For his grounds, he states as follows:

1. Debtor commenced this Chapter 13 case with the filing of a voluntary petition on March 20, 2024, filing only the preliminary schedules at that time.
2. Debtor commenced this case to halt a foreclosure.
3. Counsel requires additional information to finalize the schedules and to prepare the Chapter 13 plan, particularly information regarding the status and existence of debt owed to his homeowner's association, in order to determine the appropriate amount and the secured or unsecured status of said debt.
4. The Debtor's current Meeting of Creditors is scheduled to be held on April 22, 2024 at 11:00 A.M.
5. Counsel requests an extension until April 12, 2024 to file the remaining schedules, statements, lists, and Chapter 13 Plan.

WHEREFORE, Debtor respectfully requests that he be granted the relief sought herein and that he be granted such further relief as this Court deems just.

Date: April 3, 2024

Respectfully submitted,

SEBOBO S. SENOUWOE
By Counsel

JOHN GOETZ LAW, PLC

/s/ John P. Goetz

John P. Goetz, VSB # 78514
James M. McMinn VSB #84728
John Goetz Law, PLC
86 West Shirley Avenue
Warrenton, VA 20186
T: (540) 359-6605
F: (540) 359-6610
john@johngoetzlaw.com
Counsel for the Debtor(s)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, this 3rd day of April 2024, that a true copy of the foregoing Motion to Extend Time to File a Chapter 13 Plan was sent via first-class mail, postage prepaid, or by electronic notification to Angela M. Scolforo, Chapter 13 Trustee, and to all creditors or their counsel of record who have filed a request for notices.

/s/ John P. Goetz

John P. Goetz